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July 28, 2025

File No. 37986.9173

VIA ECF

Hon. Ona T. Wang
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Courtroom 20D
New York, New York 10007

Re: *Netrebko v. Metropolitan Opera Association, Inc. et al.*
Docket No. 23-cv-06857-AT-OTW

Dear Judge Wang:

We are counsel for Defendants Metropolitan Opera Association, Inc. and Peter Gelb (collectively, “Defendants”) in the above-referenced matter. We write jointly with Plaintiff’s counsel, Julie Ulmet, Esq. and Kara Gorycki, Esq., pursuant to Your Honor’s Order dated July 2, 2025, to submit a joint proposed agenda for the conference scheduled for August 21, 2025. The parties intend to update this letter as necessary in advance of the conference.

- **The disputes described at ECF Nos. 98 and 99**

Unfortunately, despite their good faith efforts, the parties have not resolved the disputes outlined at ECF Nos. 98 and 99. The parties’ respective positions are outlined in their submissions and they will be prepared to further discuss the issues described therein during the August 21, 2025 conference.

- **Outstanding discovery**

The parties are continuing to cooperate in producing additional documents to each other in response to additional document demands, follow-up requests, deficiency letters, and responses to third-party subpoenas.

Specifically, Defendants are currently preparing a production comprising of text messages and WhatsApp communications that they extracted from Defendant Gelb’s phone and intend to produce those to Plaintiff by no later than August 31, 2025. Plaintiff is also preparing a supplemental document production in response to Defendants’ Third Set of Document Requests that they intend to produce by August 8, 2025.

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The parties also expect to conduct the following six depositions: Plaintiff Anna Netrebko, Defendant Peter Gelb, a corporate representative of the Met Opera pursuant to Fed. R. Civ. P. 30(b)(6), and third parties Michael Heaston, Miguel Esteban and Judith Neuhoff. They have already agreed to dates upon which depositions will be completed. *See* ECF Doc. No. 97.¹

- **The Parties' proposal re completing discovery in a timely manner**

The parties submitted a proposed discovery schedule to Your Honor on June 19, 2025 which lays out their proposal for completing all discovery and depositions in a timely manner. The parties intend to stick by that schedule, but reserve all rights to make any applications to the Court should any unexpected discovery disputes arise.

We thank the Court for its time and consideration.

Respectfully,

Ariadne Panagopoulou

Ariadne Panagopoulou of
LEWIS BRISBOIS BISGAARD & SMITH LLP

cc: All Counsel (via ECF)

¹ Depending on the outcome of the dispute outlined in ECF Nos. 98 and 99, the parties may need to ~~schedule two additional depositions which will take place during the fall.~~